

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

WILHEN HILL BARRIENTOS, et al.,

Plaintiffs,


v.

CORECIVIC, INC.,

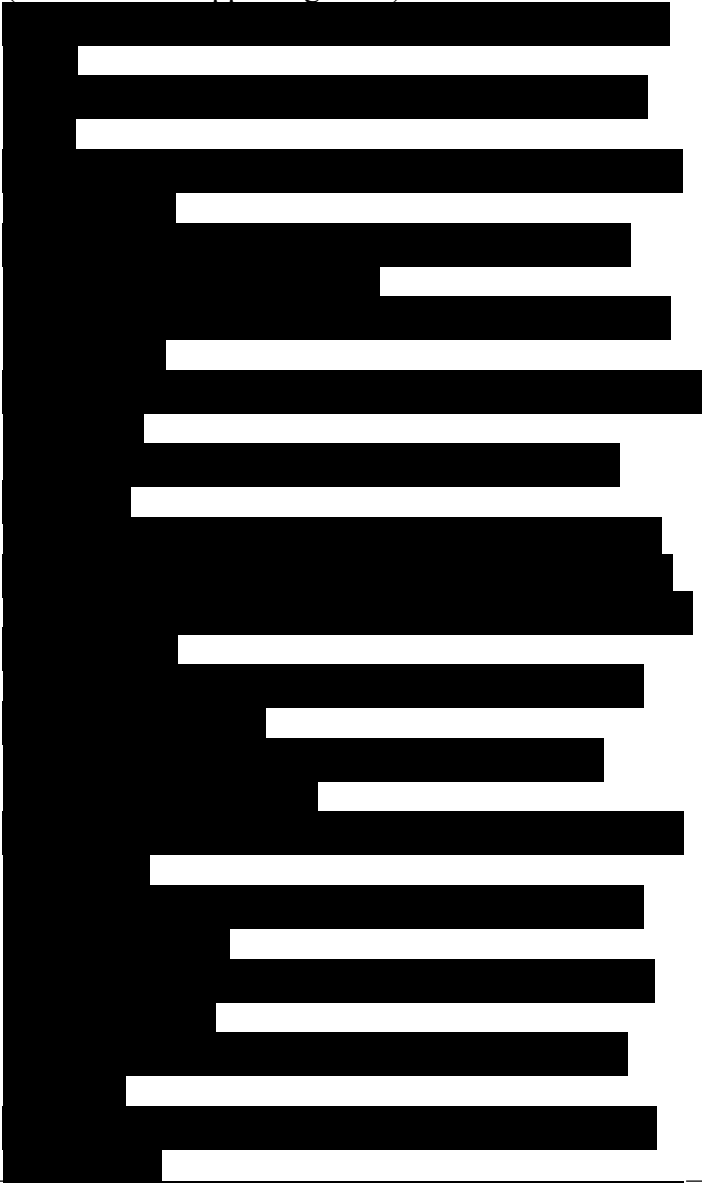




Defendant.

Civil Action No. 4:18-cv-00070-CDL

**EXHIBITS IN SUPPORT OF PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION**

<u>NO.</u>	<u>BEGINNING BATES NO.</u>	<u>DOCUMENT DESCRIPTION</u>
1	PLS_0005087 PLS_0004890	CoreCivic 2020 Annual Report Form 10-K Corrections Corporation of America (CCA) 2011 Annual Report Form 10-K
2	CCBVA0000001317	June 27, 2006 Agreement between Stewart County and CCA
3	PLS_0003640 CCBVA0000000368 PLS_0003739 PLS_0003749 CCBVA0000105880	June 3, 2006 Intra-Governmental Service Agreement (IGSA) between ICE and Stewart County June 12, 2013 IGSA Modification Jan. 9, 2016 IGSA Modification Feb. 13, 2017 IGSA Modification Feb. 8, 2018 IGSA Modification
4		Excerpts from the Deposition of Bethany Brazier (Nov. 18, 2021)
5		Excerpts from the Deposition of CoreCivic 30(b)(6) Designee Russell Washburn (Dec. 1, 2021)
6		Excerpts from the Deposition of Michael Swinton (Nov. 2, 2011)
7		Excerpts from the Deposition of Charlie Peterson (Oct. 18, 2021)
8	CCBVA0000280509	
9		Excerpts from the Deposition of CoreCivic 30(b)(6) Designee Russell Washburn (Dec. 2, 2021)
10		Excerpts from the Deposition of Juliette Drew (Dec. 3, 2021)

11	CCBVA0000206687	[REDACTED]
12	CCBVA0000001323 CCBVA0000001613 CCBVA0000001968 CCBVA0000002364 CCBVA0000002851 CCBVA0000003235	2000 Detention Operations Manual, Table of Contents (1-2) 2000 INS Detention Standard, Voluntary Work Program (3-9) 2008 Operations Manual, ICE Performance-Based National Detention Standards, Table of Contents (10-11) 2008 ICE/DRO Standard, Voluntary Work Program (12-17) 2011 ICE Performance-Based National Detention Standards (with 2013 errata), Cover and Table of Contents (18-20) 2011 PBNDS, 5.8 Voluntary Work Program (21-26)
13	CCBVA0000003317	2011 ICE Performance-Based National Detention Standards, 2016 rev.
14		Expert Report of Dr. Pablo Stewart (Second Amended)
15		Expert Report of Dr. Dora Schriro
16		Expert Rebuttal Report of Dr. Schriro
17	CCBVA0000277674	[REDACTED]
18	CCBVA0000193337	[REDACTED]
19	CCBVA0000189988	[REDACTED]
20		Excerpts from the Deposition of Terrence Lane (Oct. 5, 2021)
21		Excerpts from the Deposition of Matthew Moya (Oct. 21, 2021)

22	CCBVA0000036625 CCBVA0000196230 CCBVA0000199703 CCBVA0000204588 CCBVA0000207851 CCBVA0000223235 CCBVA0000230055 CCBVA0000231709 CCBVA0000232093 CCBVA0000260489 CCBVA0000260779 CCBVA0000260783 CCBVA0000264631 TRINITY-00013188 TRINITY-00035956 TRINITY-00041870	Plaintiffs' Demonstrative Exhibit: Staff Tenure at SDC (timeline and supporting chart) 
23	CCBVA0000118695	
24	CCBVA0000149688	
25	CCBVA0000149722	
26		Excerpts from the Deposition of Trinity 30(b)(6) Designee Susan Huffman (Jul. 14, 2021)
27	SECURUS_000095	

28	SECURUS_000094	[REDACTED]
29	CCBVA0000285629	[REDACTED]
30	CCBVA0000149956	ICE Detention Standards Compliance Review, Stewart Detention Center, May 21, 2008
31	Trinity-00001676	[REDACTED]
32	CCBVA0000278623 CCBVA0000249130	[REDACTED] [REDACTED]
33	CCBVA0000003884	SDC Policy 15-100, Detainee Discipline (effective Aug. 16, 2017)
34	CCBVA0000003918	SDC Policy 18-100, Classification Housing, Work and Program Plan (effective Nov. 17, 2017)
35	CCBVA0000118618	[REDACTED]
36	CCBVA0000003947	SDC Policy 19-100, Detainee Voluntary Work Program (effective Aug. 16, 2017)
37	CCBVA0000106421	[REDACTED]
38	CCBVA0000204154	2020 CoreCivic SDC Detainee Handbook Supplement
39		Excerpts from the Deposition of Droured Blackmon (Oct. 14, 2021)
40		Excerpts from the Deposition of Jacqueline Norman (Nov. 15, 2021)
41	CCBVA0000199375	[REDACTED]
42		Excerpts from the Deposition of Trinity 30(b)(6) Designee Marquita Crawford (Aug. 23, 2021)
43	CCBVA0000196307	[REDACTED]
44		Excerpts from the Deposition of Freddie Hood (Oct. 22, 2021)
45	CCBVA0000197160	[REDACTED]
46		Excerpts from the Deposition of Harrell Gray (Oct. 27, 2021)

47	CCBVA0000301016	[REDACTED]
48	CCBVA0000261551	[REDACTED]
49	CCBVA0000231832	[REDACTED]
50	CCBVA0000262697	[REDACTED]
51	CCBVA0000265701	[REDACTED]
52	CCBVA0000271265	[REDACTED]
53		Declaration of Gonzalo Bermudez Gutiérrez
54	CCBVA0000197022	[REDACTED]
55	PLS_0005840	ICE Enforcement and Removal Operations, COVID-19 Pandemic Response Requirements, ver. 2.0, June 22, 2020
56		Expert Report of Dr. Stephen Schwartz
57	CCBVA0000189815	[REDACTED]
58	CCBVA0000198588	[REDACTED]
59	CCBVA0000189907	[REDACTED]
60		Declaration of Wilhen Hill Barrientos
61		Excerpts from the Deposition of Calvin Blue (Nov. 10, 2021)
62	CCBVA0000196833	[REDACTED]
63	CCBVA0000198960	[REDACTED]
64	CCBVA0000207379	[REDACTED]
65	CCBVA0000219703	[REDACTED]
66	CCBVA0000197339	[REDACTED]
67	CCBVA0000217506	[REDACTED]
68		Excerpts from the Deposition of Troy Pollock (Sep. 30, 2021)

69	CCBVA0000006769	[REDACTED]
70	CCBVA0000196090	[REDACTED]
71	CCBVA0000006771	[REDACTED]
72	CCBVA0000230006	[REDACTED]
73		<i>Intentionally omitted</i>
74	CCBVA0000197201	[REDACTED]
75		Declaration of Keysler Urbina Rojas
76	CCBVA0000007900	[REDACTED]
77	CCBVA0000189938	[REDACTED]
78	CCBVA0000197174	[REDACTED]
79	CCBVA0000007302	[REDACTED]
80	CCBVA0000197890	[REDACTED]
81	CCBVA0000196662	[REDACTED]
82	CCBVA0000197294	[REDACTED]
83	CCBVA0000196483	[REDACTED]
84	CCBVA0000232829	[REDACTED]
85	CCBVA0000190325	[REDACTED]
86	CCBVA0000329489	Mar. 5, 2015 ICE Contract Discrepancy Report
87	ICE Barrientos 0017363	[REDACTED]
88	CCBVA0000003777	CoreCivic SDC Inmate/Resident Commissary Operations Policy 2-6
89	CCBVA0000106555	[REDACTED]
90	CCBVA0000106561	[REDACTED]
91	CCBVA0000106566	[REDACTED]

92	CCBVA0000106572	
93	CCBVA0000106578	
94	CCBVA0000106584	
95		Expert Report of Leonora Renda
96	CCBVA0000106024	
97	TRINITY-00000001	
98		Excerpts from the Written Deposition of Margaret Ann Giunta (Oct. 14, 2021)
99	CCBVA0000218199	
100	CCBVA0000274878	
101	TRINITY-00015126	
102	CCBVA0000265078	
103	CCBVA0000247854	
104	CCBVA0000217501	
105	CCBVA0000238645	
106	DHS00000005	
107	ICE - Barrientos 0011079	DHS Office of Inspector General, OIG-18-32, "Concerns about ICE Detainee Treatment and Care at Detention Facilities," Dec. 11, 2017
108	PLS_0004612	DHS Office of Inspector General, Adult Detention Oversight, 16-047-ISP-ICE, Working Papers, Feb. 7, 2016
109	CCBVA0000208327	
110	CCBVA0000332890	Jan. 18, 2012 Emails, "Food Service Reports December 2011," from J. Brantley, J. Ellis, & M. Turner, with attachment
111	CCBVA0000245041	
112	CCBVA0000202852	
113	ICE - Barrientos 0015880	
114	CCBVA0000217139	
115	CCBVA0000216707	

116	CCBVA0000208475	[REDACTED]
117	CCBVA0000266489	[REDACTED]
118	ICE-Barrientos-0001_00002	[REDACTED]
119	CCBVA0000003799	[REDACTED]
120	CCBVA0000223449	[REDACTED]
121	CCBVA0000197840	[REDACTED]k
122	CCBVA0000189805	[REDACTED]
123	CCBVA0000197370	[REDACTED]
124	CCBVA0000197770	[REDACTED]
125	CCBVA0000196929	[REDACTED]
126	CCBVA0000198287	[REDACTED]
127	CCBVA0000058749	[REDACTED]
128	CCBVA0000165416	[REDACTED]
129	CCBVA0000196243	[REDACTED]
130	CCBVA0000006287	[REDACTED]
131	CCBVA0000230464	[REDACTED]
132	CCBVA0000262702	[REDACTED]
133	CCBVA0000329559	May 14, 2015 Emails, "Possible Work Stoppage," from J. Ellis, S. Richardson
134	CCBVA0000246892	[REDACTED]
135	CCBVA0000251384	[REDACTED]